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8 UNITED STATES BANKRUPTCY COURT
9 EASTERN DISTRICT OF WASHINGTON

10 IN RE:

11 Easterday Ranches, Inc. and Easterday Farms,
12 a Washington general partnership,

13 Debtors.
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Chapter 11

Case No. 21-00141-WLH11 and
Case No. 21-00176-WLH11

**AGREED ORDER ON MOTION FOR
RELIEF FROM AUTOMATIC STAY**

15 Based upon the agreement of Santander Consumer USA Inc. dba Chrysler Capital, its
16 assignees and/or successors ("Creditor"), and debtor Easterday Farms, a Washington general
17 Partnership ("Debtor"), by and through its respective counsel, it is hereby ORDERED as
18 follows:

- 19 1. This order affects the following two vehicles: (1) 2018 Ram 3500
20 VIN: 3C63R3AL4JG277090, and (2) 2018 Ram 3500 VIN: 3C63R3ALXJG374391
21 (collectively, the "Vehicles" and each, a "Vehicle"). The parties have stipulated to the terms
22 of this order, which are non-modifiable without the parties' written consent.
- 23 2. Debtor shall remit to Creditor the sum of \$60,000.00 (the "Funds") (\$30,000.00 for each of
24 the Vehicles) in full and complete satisfaction of Creditor's claim(s) for each Vehicle.
- 25 3. Within fourteen (14) calendar days after the Funds are received by Creditor, Creditor shall
26 release and send titles for both Vehicles to Debtor's counsel or such other address indicated
27 by Debtor's counsel.
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- 1 4. Upon Creditor's receipt of the Funds, Claim Nos. 30 and 87 (Case No. 21-00176-WLH11)
2 and Claim No. 34 (Case No. 21-00141-WLH11) shall be deemed withdrawn with prejudice
3 in every respect, and Creditor shall be deemed to have fully and forever released, waived,
4 and discharged any and all claims, interests, obligations, rights, suits, damages, causes of
5 action, remedies, and liabilities whatsoever, asserted or assertable by or on behalf of
6 Creditor, whether known or unknown, foreseen or unforeseen, existing or hereafter arising, in
7 state or federal law, equity, or otherwise, against the Debtors and their respective officers,
8 directors, managers, members, employees, investors, principals, representatives, and
9 affiliates, arising from, related to, or in connection with the Debtors (whether prepetition or
10 postpetition).
- 11 5. Creditor shall have no deficiency claim(s) against the Debtors, the Debtors' estates, or any
12 other third party in relation to the Vehicles.
- 13 6. Payment shall be made directly to Santander Consumer USA Inc. dba Chrysler Capital, 5201
14 Rufe Snow Drive, Ste. 400, North Richland Hills, TX 76180, or as otherwise agreed on by
15 the parties.
- 16 7. The fourteen (14) day stay provided in Fed. R. Bankr. P. 4001(a)(3) is waived, and the terms
17 and conditions of this order shall be immediately effective and enforceable upon its entry.
- 18 8. The court shall retain jurisdiction and power to hear and determine all matters arising from or
19 related to the implementation of this order.

20
21 /// END OF ORDER ///

22 Submitted by:

23 MCCARTHY & HOLTHUS, LLP
24

25 /s/ Lance E. Olsen
26 Lance E. Olsen, WSBA# 25130
27 Attorney for Creditor

28 Stipulated by:

29 BUSH KORNFELD LLP

1
2 /s/ Thomas A. Buford
3 Thomas A. Buford, WSBA# 52969
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5 Attorneys for Debtors
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